

**From:** Dan Connally  
**To:** ["Lum, Darryl C"](#)  
**Subject:** FW: Kailua WWTP\_HI\_7-25-2013\_Admin Draft Permit  
**Date:** Tuesday, August 13, 2013 1:42:00 PM  
**Attachments:** [Kailua WWTP\\_HI\\_8-13-2013\\_Admin Draft Permit.doc](#)  
[Kailua WWTP\\_HI0020117\\_8-13-2013\\_Admin Draft Fact Sheet.docx](#)

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**From:** Dan Connally  
**Sent:** Tuesday, August 13, 2013 1:41 PM  
**To:** 'Poentis, Kris T'  
**Subject:** RE: Kailua WWTP\_HI\_7-25-2013\_Admin Draft Permit

Hey Kris, I've made edits based on your comments, with the exception of comment 3. Can you provide the Waianae permit or the text that you added for the sludge discharge downstream of the influent sampler? My major concern with this is that if it's into the influent, then the influent sampling results won't provide representative data of what's actually going into the treatment plant and we'll also have incorrect percent removal data for TSS and BOD. However if it's for discharge directly to solids handling portions of the facility (digesters), then it probably wouldn't be an issue.

Thank you,

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**From:** Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]  
**Sent:** Thursday, July 25, 2013 2:44 PM  
**To:** Dan Connally  
**Cc:** Lum, Darryl C  
**Subject:** RE: Kailua WWTP\_HI\_7-25-2013\_Admin Draft Permit

Hi Dan,  
Thanks for the updates. My two cents are below. Thanks!

Kris

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**From:** Dan Connally [<mailto:dan.connally@pgenv.com>]  
**Sent:** Thursday, July 25, 2013 7:53 AM  
**To:** Poentis, Kris T  
**Cc:** Lum, Darryl C  
**Subject:** Kailua WWTP\_HI\_7-25-2013\_Admin Draft Permit

Hey Kris, attached is a revised Kailua (all changes in tracked changes). I've attempted to address all of the Discharger's comments, as well as add a compliance schedule and revise the nutrients. There are a couple issues I need some feedback from you on before I can do some final edits:

- 1) They are requesting that mass-based limits be based on a design flow of 15.25 MGD (specifically for BOD, TSS, chlordane and dieldrin). The previous permit based them on 12.7 MGD for BOD and TSS. I can't grant them an increase for those two parameters due to anti-deg (unless they submit an anti-deg study). I could grant them mass-based limits for other parameters based on 15.25 MGD, what do you think about that? This change would take about 5 minutes for me. *I'm not sure how we can grant 15.25 mgd for some parameters and not for others. I think it should be kept at 12.7 for all.*
- 2) The requested that I include a table of the existing nearshore monitoring station locations (lat and longs). We did this for offshore stations, but didn't for the nearshore because they're current stations are not within 300 meters (which was required). The current permit requires them to establish stations within 300 meters for nearshore monitoring. They claim they can't due to hazardous conditions, but do not provide any additional information on the "hazardous conditions". I would recommend we ask them to provide documentation describing these conditions. Adding the table would only take about 5 minutes if you decide we should do this. *I don't think we should add it in. They can put it in their monitoring plan. We need to specify clearly that whatever stations they choose, it is for compliance, even if it is outside the 300 meters. Or should we force them to choose somewhere within 300 meters? They burned me on this before...We allowed them to sample outside of the 300 m because of "hazardous conditions" then when we told them they are in noncompliance, they said that the monitoring stations are outside of 300 meters so the limit doesn't apply.*
- 3) The state the would like to include provisions in the permit to allow outside generated sludge to be discharged DOWNSTREAM of the treatment plant's influent sampler so it can be treated directly by the plant's solids handling facility. I'm not sure why they want to go downstream of the influent sampler, I have to give this some more thought. Not sure how this impacts regs. You might want to discuss internally with DOH staff as well. Adding this provision would only take a few minutes if you decide we should do this. *We allowed this for Waianae WWTP. I couldn't think of a reason why it would conflict with any regs and at the time, I spoke with our enforcement people and they didn't have a problem with it either.*
- 4) The included a comment that states, "Disposal at MSW Landfill should only require the Paint Filter Liquids Test, not groundwater monitoring or certification regarding aquifer

contamination.” This statement is in regards to DOH’s standard biosolids requirements. I assume the tests are for the protection of groundwater. Please advise how you would like to be proceed with this. This change, if deemed appropriate, would only take a minute. In the Waianae WWTP permit, we have this language in H.1.c(2) “Sludge shall not contain "free liquids" as defined by EPA Method 9095 (Paint Filter Liquids Test).” The existing language in Kailua for MSW Landfill disposal is for land-applied sludge only in the Waianae permit. I think it is ok to use the Waianae language since the landfill is regulated by Solid and Hazardous Waste requirements (liner, leachate, etc.).

- 5) After all their comments, I’m unclear on exactly who the Director is, it appears to be Lori M.K. Kahikina. Can you please confirm? Once confirmed I will update the Director in the draft. They have requested that the Director, Deputy Director, and Second Deputy Director be authorized to sign reports. This is ok, but they did not provide the names of these individuals. They should provide written authorization, including their names. The Director is now Lori Kahikina. You don’t need to specifically allow for the deputies to sign – they can always sign “for” the Director as long as the signature block is that of the Directors. I don’t think we have ever added this type of language.

If you’d like to discuss any of these, please feel free to give me a call. I will be providing the fact sheet immediately following this email. I will be switching over to finish up Honouliuli at this point, and incorporated all these same edits.

Thank you,

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